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14 Attorneys for BRYAN ADAMS

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18
19 UNITED STATES OF AMERICA,) CASE NO. 3:17-CR-00294-RS
20 Plaintiff,)
21 v.) STIPULATION AND [PROPOSED] ORDER
22 BRYAN ADAMS,) EXCLUDING TIME
23 Defendant.)
24 _____)

25 On November 7, 2017, defendant and his attorneys appeared before this Court. The parties
26 agreed that additional time was necessary to meet with the case agent and review extensive amount of
discovery that could only be viewed at the FBI's office in San Francisco. In addition, counsel had an
opportunity to review other discovery materials provided electronically to defense counsel. Counsel for
the defendant has expended considerable time, effort, and resources to provide the Government with an
exhaustive forensic psychological and risk assessment evaluation. Therefore, additional time is
necessary for parties to meet and discuss the evaluation.

27 Counsel for the Government has been in trial for approximately the last two weeks terminating
28 on or about Wednesday, February 21, 2018. Counsel for the defendant and the Government therefore

1 request additional time to evaluate the information provided. The parties agree and jointly request the
2 time between February 27 and the new proposed date of March 27, 2018 be excluded in order to
3 provide reasonable time necessary for the effective preparation of counsel pursuant to 18 U.S.C. §
4 3161(h)(7)(B)(iv). The parties agree that the ends of justice served by granting the continuance outweigh
5 the best interest of the public and the defendant in a speedy trial.

6
7 Respectfully Submitted,
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DATED: February 26, 2018
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10 /s/
11 JAMES A. BUSTAMANTE
12 Attorney for Defendant BRYAN ADAMS
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14 /s/
15 FORD GREENE
16 Attorney for Defendant BRYAN ADAMS
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18 /s/
19 SHIAO LEE
20 Assistant United States Attorney
21

[PROPOSED] ORDER

22 For the reasons stated above, the Court finds that the exclusion of time from February 27, 2018
23 through and including March 27, 2018, is warranted and that the ends of justice served by the
24 continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §
25 3161(h)(7)(A). The failure to grant the requested continuance would deny effective preparation of
26 counsel, and would result in a miscarriage of justice. 18 U.S.C. §§ 3161 (h)(7)(B)(iv).

27 IT IS SO ORDERED.
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2 DATED: 2/26/18
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HON. RICHARD SEABORG
United States District Court Judge